

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

SECURITYSCORECARD, INC.,

Plaintiff,

-against-

SAFE SECURITIES, INC. d/b/a SAFE
SECURITY and MARY POLYAKOVA,

Defendants.

Case No. 24-cv-04240

**DECLARATION OF DAVID
JIMENEZ**

I, David Jimenez, declare under penalty of perjury that the following statements are true and correct:

1. I am a Senior Managing Consultant with Berkeley Research Group, LLC (“BRG”) in the firm’s nationally recognized Discovery and Forensic Technology Services group. That practice group provides, among other things, consulting and expert services in the area of computer forensics, electronic discovery, and other associated technology advisory services to corporations, law firms, and governments in the United States and abroad.

2. I personally have more than 19 years of experience in investigations, technology, and computer forensic matters. I regularly advise both corporate clients and law firms on information technology, digital forensics, and e-discovery issues. I specialize in performing electronic collections, conducting digital forensic investigations, e-discovery project management and incident response. I have performed hundreds of computer forensic investigations, performed onsite analysis of cybersecurity breaches, and have assisted counsel with the preservation and management of large volumes of data in response to civil litigation, government inquiries and internal investigations. A true and correct copy of my *curriculum vitae*, which summarizes my

professional and educational background, is attached hereto as **Exhibit 1**. My professional time for analysis and testimony is not contingent on any outcome and is currently billed at \$495 per hour.

3. I have personal knowledge of all the facts set forth in this Declaration.

4. BRG and I were engaged by Plaintiff SecurityScorecard, Inc. (“SSC”) to conduct a forensic investigation and analysis of SSC’s cybersecurity ratings customer platform (the “Platform”) to (i) determine whether Defendant Safe Securities, Inc. *d/b/a* Safe Security (“SAFE”) was using accounts registered to a separate entity, Starlit Group, as a proxy to log-in to and spend time on the Platform, and (ii) to analyze the Platform activity observed in those accounts.

5. Attached hereto as **Exhibit 2** is a true and correct copy of BRG’s forensic report in the above-captioned matter, together with Exhibits A-J attached thereto.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 26, 2024


David Jimenez